

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JAMES GOODREAU AND  
ANN GOODREAU

-VS.-

ICS, BLOUNT INC.

C.A. No. 05-11611 WGY

## SUPPLEMENTAL JOINT PRECONFERENCE STATEMENT

## INTRODUCTION

This personal injury action stems from an incident on December 13, 2004, in which the Plaintiff, James Goodreau, alleges he sustained severe personal injuries when he was struck by the chain ICS 835 Pro-plus Hydraulic Chainsaw, manufactured, designed, developed, tested, inspected, promoted, marketed, and/or sold by the Defendant. The plaintiffs have brought a negligence claim against the Defendant. In addition, the Plaintiffs have brought a breach of warranty claim against the Defendant. The Plaintiff, Ann Goodreau, has brought a loss of consortium claim against the Defendants.

Defendant denies plaintiffs' allegations of negligence and breach of warranty.

**I. AGENDA OF MATTERS FOR DISCUSSION AT SCHEDULING CONFERENCE:**

1. The proposed Pre-Trial schedule; and
2. Time for accomplishment of the specified Pre-Trial Steps.

## II. PROPOSED PRE-TRIAL SCHEDULE:

The parties propose that discovery occur as follows:

**Initial Disclosures Will Be Exchanged:**

December 8, 2005

**Deadline For Parties to Exchange Written Discovery:**

No later than February 6, 2006

**Deadline For Motion To Change Venue, Joinder Of  
Parties And Amendment Of Pleadings:**

May 6, 2006

**Non-Expert Depositions To Be Completed On Or Before:**

May 31, 2006

**Plaintiff Shall Designate Experts And Provide  
Rule 26(a)(2) Information On Or Before:**

June 30, 2006

**Defendant Shall Designate Experts and Provide  
Rule 26(a)(2) Information On Or Before:**

July 31, 2006

**Expert Depositions To Be Completed On Or Before:**

August 31, 2006

**III. SCHEDULE FOR MOTION AND PRE-TRIAL CONFERENCE**

**All Motions For Summary Judgment F.R.C.P. 56 To Be Filed On Or Before:**

September 18, 2006

**Joint Pre-trial Conference Statement To Be Filed On Or Before:**

September 18, 2006

**Trial:**

November 6, 2006

**V. ADR OPTIONS:**

This case will go to ADR during September, 2006.

**VI. CONSENT TO TRIAL BY MAGISTRATE:**

At this time, the defendant does not consent to a trial of this matter by a Magistrate Judge.

Plaintiffs,  
JAMES GOODREAU AND  
ANN GOODREAU  
By their attorney,

/s/ Brian C. Dever

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Defendant,  
BLOUNT, INC.  
By its attorneys,

/s/ John F. Kelleher

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Dated: October 27, 2005